

John J. E. Markham, II (CA Bar No. 69623)

Email: jmarkham@markhamread.com

Bridget A. Zerner (MA BBO No. 669468)

Email: bzerner@markhamread.com

MARKHAM & READ

One Commercial Wharf West

Boston, Massachusetts 02110

Tel: (617) 523-6329

Fax: (617) 742-8604

Attorneys for Plaintiffs

BRUCE CAHILL, GREG CULLEN, SHANE SCOTT,

RON FRANCO, and PHARMA PAK, INC.,

IN THE UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA
SOUTHERN DIVISION

BRUCE CAHILL, an individual, et al.,)	CASE NO: 8:16-cv-00686-AG-DFM
)	
Plaintiffs,)	PLAINTIFFS' AND
)	COUNTERCLAIM DEFENDANTS'
-- vs. --)	OBJECTION TO THE "RESPONSE
)	OF UNDERSIGNED CLIENTS . . ."
PAUL PEJMAN EDALAT, an)	(DKT NO. 211) (REVISED)
individual, et al.,)	
)	
Defendants.)	
)	
)	
)	
)	

<hr/>)	Honorable Andrew J. Guilford
AND RELATED CROSS-)	United States Courthouse
CLAIMS/COUNTERCLAIMS.)	411 West Fourth Street
<hr/>)	Santa Ana, CA 92701-4516

1 Plaintiffs and Counterclaim Defendants, through their undersigned counsel,
2 object to the recently-submitted “Response of Undersigned Clients” (Dkt. No.
3 211), hereinafter referred to as the “Response.” This Response was submitted by
4 the parties themselves, not their attorneys of record. It should be completely
5 disregarded for three reasons:
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8 First, the parties filing the Response are represented by attorneys of record.
9 L.R. 83-2.3.1, makes clear that “[w]henever a party has appeared by an attorney,
10 the party may not thereafter appear or act *pro se*, except upon order made by the
11 Court after notice to such attorney and to any other parties who have appeared in
12 the action.”
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15 Second, the Response, which purports to speak for two corporate entities,
16 violates L.R. 83-2.2.2, which provides that “[n]o organization or entity of any other
17 kind . . . may appear in any action or proceeding unless represented by an attorney
18 permitted to practice before this Court under L.R. 83-2.1.”
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21 Third, it would be quite reasonable for this Court to infer that the Response
22 was drafted for the parties involved by an attorney, based on the language used and
23 the legal concepts discussed. Attorneys should sign the writings they submit for
24 court consideration, thereby subjecting the writing and the lawyer involved to the
25 obligations of Rule 11, *Fed. R. Civ. Pro.* The Response is a particularly good
26 candidate for the Rule 11 requirements, in light of its complete contradiction of the
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1 assertions made in the filing of the attorney of record on the subject of the attorney
2 withdrawal being sought. *See*, Application for Leave to Withdraw (Dkt. No. 199).
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4 Dated: March 30, 2017

Respectfully submitted,

5 MARKHAM & READ
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7 By: /s/ John J. E. Markham, II

8 John J. E. Markham, II
9 *Attorney for Plaintiffs and*
10 *Counterclaim Defendants*
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CERTIFICATE OF SERVICE

Commonwealth of Massachusetts) ss,
County of Suffolk.)

I am employed in the county and state aforesaid. I am over the age of 18 and not a party to the within action. My business address is One Commercial Wharf West, Boston, MA 02110

On March 30, 2017, I served the foregoing document described as:

OBJECTION TO “RESPONSE OF UNDERSIGNED CLIENTS. . .” (DKT NO. 211) (REVISED)

[X] BY ELECTRONIC MAIL via the ECF filing system on:

Kristopher Price Diulio, Esq.
Brendan M. Ford, Esq.
FORD & DIULIO, PC
695 Town Center Drive, Ste 700
Costa Mesa, CA 92626
(714) 384-5542
kdiulio@forddiulio.com
bford@FordDiulio.com

Attorneys for Defendants Paul Pejman Edalat, Olivia Karpinski, Farah Barghi, Blue Torch Ventures, Inc., LIWA, N.A., Inc., Sentar Pharmaceuticals, Inc. and EFT Global Holdings, Inc.

Since the parties involved served the pleading to which this pleading responds via their counsel of record although purporting it to be their own, *pro se* pleading, service of this response on that counsel is appropriate.

Executed on March 30, 2017, in Boston, Massachusetts.

I declare under penalty of perjury under the laws of United States and the State of California that the foregoing is true and correct.

/s/ Bridget A. Zerner

Bridget A. Zerner